

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the  
Northern District of New York

UNITED STATES OF AMERICA )

v. )

HASON HARRES )

Case No. 1:23-MJ- 249 (DJS)

Defendant )

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about the date(s) of January 11, 2023 in the county of Schenectady in the Northern District of New York the defendant violated:

*Code Section*

21 U.S.C. §§841(a)(1), (c)

*Offense Description*

Distribution of a Controlled Substance

This criminal complaint is based on these facts:  
See attached affidavit

☒ Continued on the attached sheet.

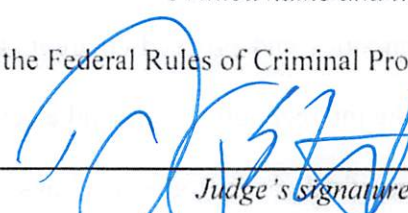

*Complainant's signature*

Robert Willey, DEA Task Force Officer

*Printed name and title*

Attested to by the affiant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Date: May 1, 2023


*Judge's signature*

City and State: Albany, NY

Hon. Daniel J. Stewart, U.S. Magistrate Judge

*Printed name and title*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK**

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Robert Willey, being duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I make this affidavit in support of a criminal complaint charging HASON HARRES (“HARRES”) distributing a controlled substance, in violation of 21 U.S.C. §841(a)(1).

2. I am a Task Force Officer (TFO) of the Drug Enforcement Agency (DEA), an agency of the Department of Justice. I am empowered to investigate and make arrests for offenses of Title 18 and 21 of the United States Code. I am also Criminal Investigator with the Colonie Police Department. I have been a member of the Colonie Police Department since July 2010, and I have been a DEA TFO since January 2019.

3. During my career in law enforcement, I have taken part in hundreds of narcotics and gang-related investigations and numerous narcotics, gang and conspiracy- related investigations and numerous narcotics, gang and conspiracy-related training classes instructed by local, state and federal agencies. I have arrested numerous individuals for violations of federal and state narcotics laws. I have participated in the execution of many search warrants resulting in the seizure of narcotics and proceeds thereof. I have also participated in the execution of orders authorizing the interception of wire and electronic communications, the subject of which were in the possession of sale of narcotics and guns. As a result, I am familiar with the technical aspects of intercepting wire and electronic communications. Additionally, I have interviewed and worked with reliable confidential informants, whose assistance resulted in the controlled purchases of narcotics and guns, and the introduction of undercover police officers to persons who engage in

the sale of narcotics and guns. I have attended several schools and seminars, including those given by the DEA, the New York/New Jersey High Intensity Drug Trafficking Area (“HIDTA”) program, HSI and other agencies of which concern the enforcement of laws prohibiting the trafficking of narcotics, guns and money laundering, as well as the packaging and concealment of narcotics. Because of these experiences, I am familiar with the coded language, conduct, and customs of people engaged in the conspiracies to violate the drug, gun and money laundering laws of New York and the United States.

#### PROBABLE CAUSE

4. On or about January 11, 2023, an undercover officer (“UC”) purchased 230 counterfeit Oxycodone pills from HASON HARRES in exchange for \$3,000.

5. The pills HARRES sold to the UC are disguised to look like legitimately-produced Oxycodone pills in that they are pressed with the number “30,” but they tested positive for fentanyl.

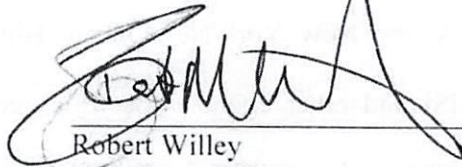
6. The transaction took place in front of HARRES’ residence on Mumford Street, Schenectady, New York. New York State Department of Motor Vehicle (“DMV”) records indicate that HARRES resides at that location in front of which the transaction occurred, and that HARRES has a Chevrolet Colorado pickup truck registered to him at that address.

7. The UC arranged the purchase of the pills by calling HARRES at a cellular telephone number that the UC has used to arrange previous and subsequent controlled substance purchases.

#### CONCLUSION

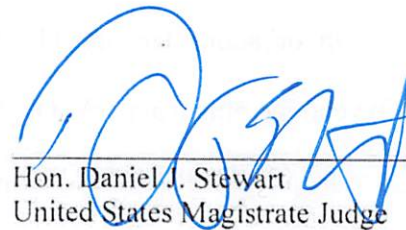
8. Based on the forgoing, I believe there is probable cause to establish that HASON HARRES has violated 21 U.S.C. §§841(a)(1), (c) which prohibits distributing a controlled substance; in that HARRES handed the UC 230 counterfeit Oxycodone pills containing fentanyl

in exchange for \$3,000. I therefore request that a criminal complaint be issued pursuant to this violation of federal law.



Robert Willey  
Task Force Officer  
Drug Enforcement Administration

I, the Honorable Daniel J. Stewart, United States Magistrate Judge, hereby acknowledge that this affidavit was attested to by the affiant on May 1, 2023, in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.



Hon. Daniel J. Stewart  
United States Magistrate Judge